

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE	)	
IMPLANT PRODUCTS LIABILITY	)	MDL NO. 2272
LITIGATION	)	
	)	
This Document Relates to All Cases	)	Master Docket Case No. 1:11-cv-05468
	)	
	)	Honorable Rebecca Pallmeyer

**AGREED MOTION FOR ENLARGEMENT OF TIME TO SUBMIT  
COMMON BENEFIT ORDER AND STIPULATION OF DISMISSAL**

Pursuant to the parties' representations to the Court during the October 2, 2012, Status Conference and the Court's October 3, 2012, Minute Entry, the parties anticipated filing a proposed common benefit order and stipulation of dismissal of certain defendants by October 15, 2012. Despite due diligence, negotiations regarding those documents are ongoing, and the parties require an additional seven days beyond the October 15, 2012, deadline to file said documents.

The parties, therefore, respectfully request an additional seven days to submit a proposed common benefit order and proposed stipulation of dismissal of certain defendants to the Court.<sup>1</sup>

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<sup>1</sup> Counsel for the plaintiffs, James Ronca, authorized the undersigned counsel to indicate the plaintiffs' agreement to the requested enlargement.

Respectfully submitted,

Dated: October 15, 2012

FAEGRE BAKER DANIELS LLP

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(incorrectly named as (1) Zimmer Tri-State d/b/a Tri-  
State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer,  
Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State  
Orthopedic), K. Michael Melia, d/b/a Zimmer Melia &  
Associates, Inc. (incorrectly named as Zimmer Melia  
& Associates, Inc.), Zimmer Orthobiologics, Inc.,  
Zimmer US, Inc., and Zimmer Production, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on October 15, 2012, a copy of the foregoing Agreed Motion For Enlargement Of Time To Submit Common Benefit Order And Stipulation Of Dismissal was filed electronically. Parties may access this filing through the Court's system.

/s/ Andrea Roberts Pierson